EXHIBIT "1"

	Case 2:18-cv-00317-GMN-DJA Document 61-1 Filed 01/10/19 Page 2 of 4		
1	KEREN E. GESUND, ESQ.		
2	Nevada Bar No. 10881 GESUND & PAILET, LLC		
3	5550 Painted Mirage Rd. Suite 320		
4	Las Vegas, NV 89149		
5	Tel: (702) 300-1180 Fax: (504) 265-9492		
6	keren@gp-nola.com		
7	and		
8	O. Randolph Bragg HORWITZ, HORWITZ & ASSOC.		
9	25 East Washington Street, Suite 900		
10	Chicago, IL 60602 (312) 372-8822		
11	rand@horwitzlaw.com Attorneys for Plaintiff		
12			
13	UNITED STATES DISTRICT COURT		
14	DISTRICT OF NEVADA		
15	NICOLE DIANE LA CARIA, on behalf of herself and all others similarly situated; Case No.: 2:18-cv-00317-GMN-GWF		
16	Plaintiff,		
17	r minuri,		
18	VS.		
19	NORTHSTAR LOCATION SERVICES, LLC, A New York limited liability company, and		
20	JOHN DOES 1-10.		
21	Defendant.		
22			
23	DECLARATION OF KEREN E. GESUND		
24	IN SUPPORT OF PLAINTIFF'S MOTION FOR CLASS CERTIFICATION		
25	I, Keren E. Gesund, declare under penalty of perjury, as provided for by the laws of th		
26	United States, 28 U.S.C. §1746, that the following is true and correct:		
27	1. I am one of the attorneys representing Plaintiff Scott N. Masson in this matter.		
28	2. I am a member in good standing of the bars of the following:		
	- 1 -		

Ī	Case 2:18-cv	-00317-GMN-DJA Document 61-1 Filed 01/10/19 Page 3 of 4
1		
2		Supreme Court of California San Francisco, CA
3		2007
4		Supreme Court of Nevada
5	5 Carson City, NV 2008	Carson City, NV 2008
6		Suprema Court of Louisiana
7		Supreme Court of Louisiana New Orleans, LA
8		2011
9	9 U.S. Court of Appeals for the Ninth Circuit San Francisco, CA 2016	• •
10		
11		U.S. District Court for the District of Nevada
12		Las Vegas, NV 2012
13		
14		U.S. District Court for the Eastern District of Louisiana New Orleans, LA
15	2011	2011
16		U.S. District Court for the Western District of Louisiana
17	All Parishes 2016	
18		U.S. District Court for the Middle District of Louisiana
19		Baton Rouge, LA 2018
20		
21	2 U.S. District Court Eastern District of Texas	U.S. District Court for the Northern District of Texas 2016
22		U.S. District Court Eastern District of Texas
23		
24	2012	
25		2012
26	3.	I am a 2007 graduate of the University of California at Davis School of Law.
27	4.	From 2007-2010, I worked in Las Vegas as a litigation associate.
28		
		- 2 -

- 5. From 2011 to 2013, I worked for Sessions, Fishman, Nathan & Israel representing debt collectors.
- 6. In 2013, I opened my law office exclusively representing consumer rights in both individual and class cases.
- 7. Since 2011, I have represented numerous debt collectors and consumers for claims under the Fair Debt Collection Practices Act.
- 8. On November 21, 2018, I visited the United States Postal Service's website at https://postcalc.usps.com/ServiceCommitments and used the service commitment calculator to calculate the length of time it takes mail to get from one zip code to another.
- 9. A letter mailed from Matrix' facility at 6341 Inducon Drive E, Sanborn, New York 14132 to 50 Fountain Plaza, Buffalo, New York 14202, a distance of approximately 23 miles, takes more than one day to arrive.
- 10. Similarly, a letter mailed from Matrix facility at 6341 Inducon Drive E, Sanborn, New York 14132 to Ms. La Caria's address in Henderson, Nevada 89074-8248 takes more than one day to arrive.

Executed this 21st day of November, 2018.

/s/ Keren E. Gesund